

# **EXHIBIT A**



**Service of Process  
Transmittal**

08/22/2019

CT Log Number 536105624

**TO:** Carol Herceg  
The Prudential Insurance Company of America  
2101 Welsh Road, Law Dept.  
Dresher, PA 19025

**RE: Process Served in Louisiana**

**FOR:** The Prudential Insurance Company of America (Domestic State: NJ)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** LARIZA R WILLIAMS, PLTF. vs. The Prudential Insurance Company of America, Dft.

**DOCUMENT(S) SERVED:** Letter, Citation, Petition(s), Verification(s), Interrogatories

**COURT/AGENCY:** 15th Judicial District Court, Parish of Lafayette, LA  
Case # C20191017C

**NATURE OF ACTION:** Insurance Litigation

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Baton Rouge, LA

**DATE AND HOUR OF SERVICE:** By Certified Mail on 08/22/2019 postmarked on 08/21/2019

**JURISDICTION SERVED :** Louisiana

**APPEARANCE OR ANSWER DUE:** Within 15 days after the service hereof

**ATTORNEY(S) / SENDER(S):** Allen J. Myles  
Myles & Myles  
Post Office Box 877  
Plaquemine, LA 70764  
225-687-2822

**ACTION ITEMS:** CT has retained the current log, Retain Date: 08/22/2019, Expected Purge Date: 08/27/2019

Image SOP

Email Notification, Legal Process Unit legal.process.unit@prudential.com

Email Notification, Carol Herceg carol.herceg@prudential.com

**SIGNED:** C T Corporation System

**ADDRESS:** 3867 Plaza Tower Dr.  
Baton Rouge, LA 70816-4378

**For Questions:** 954-473-5503

**R. KYLE ARDOIN**  
**SECRETARY OF STATE**  
**P.O. BOX 94125**  
**BATON ROUGE, LA 70804-9125**



U.S. POSTAGE PITNEY BOWES



ZIP 70802 \$ 004.95<sup>0</sup>  
02 4W  
0000367689 AUG 21, 2019



Baton Rouge P&DG 70804-9125  
WED 21 AUG 2019 PM

70804 0160 0000 4682 3005



**State of Louisiana  
Secretary of State**

08/21/2019

Legal Services Section  
P.O. Box 94125, Baton Rouge, LA 70804-9125  
(225) 922-0415

PRUDENTIAL INSURANCE COMPANY OF AMERICA  
C/O CT CORPORATION SYSTEM  
3867 PLAZA TOWER DR  
BATON ROUGE, LA 70816

Suit No.: 20191017  
15TH JUDICIAL DISTRICT COURT  
LAFAYETTE PARISH

LARIZA R. WILLIAMS  
vs  
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA

Dear Sir/Madam:

I am enclosing a citation served in regard to the above entitled proceeding. If you are not the intended recipient of this document, please return it to the above address with a letter of explanation. All other questions regarding this document should be addressed to the attorney that filed this proceeding.

Yours very truly,

R. KYLE ARDOIN  
Secretary of State

Served on: R. KYLE ARDOIN  
Served by: E CUMMINS

Date: 08/20/2019  
Title: DEPUTY SHERIFF

**No: 1131356**

TG





LAFPC.CV.56640493

cc\_maarceneaux

Ordered by Atty.: ALLEN J. MYLES

**CITATION**

**SERVICE COPY**

**LARIZA R WILLIAMS**

**FIFTEENTH JUDICIAL DISTRICT COURT**

**VS**

**DOCKET NUMBER: C-20191017 C**

**PRUDENTIAL INSURANCE COMPANY OF AMERICA** **PARISH OF LAFAYETTE, LOUISIANA**

**STATE OF LOUISIANA**

**TO: THE PRUDENTIAL INSURANCE COMPANY OF AMERICA  
THROUGH ITS AGENT FOR SERVICE OF PROCESS  
LOUISIANA SECRETARY OF STATE  
8585 ARCHIVES AVE  
BATON ROUGE, LA 70809**

**PAUPER**  
SERVED ON  
R. KYLL ARDOIN  
AUG 20 2019  
SECRETARY OF STATE  
COMMERCIAL DIVISION

of the Parish of E BATON ROUGE

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the FIFTEENTH JUDICIAL DISTRICT COURT, in the Lafayette Parish Courthouse, LAFAYETTE, Louisiana, within fifteen (15) days after the service hereof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

Witness the Honorable Judges of said Court, this AUGUST 6, 2019.

  
Deputy Clerk of Court  
Lafayette Parish

**\*Additionally, you are hereby served with the following attached documents and ordered to comply with same:**

**FAXED AND ORIGINAL PETITION FOR BREACH OF CONTRACT, VERIFICATION AND INTERROGATORIES**

**SHERIFF'S RETURN  
LAFAYETTE PARISH SHERIFF**

**PAUPER**

**SERVICE COPY**

DATE SERVED: \_\_\_\_\_, 20\_\_\_\_ TIME: \_\_\_\_\_  
SERVED: \_\_\_\_\_  
PERSONAL ( ) \_\_\_\_\_  
DOMICILIARY ( ) ON \_\_\_\_\_  
UNABLE TO LOCATE      MOVED ( )      NO SUCH ADDRESS ( )  
OTHER REASON: \_\_\_\_\_  
RECEIVED TOO LATE FOR SERVICE ( )  
SERVICE OF WITHIN PAPERS  
COSTS FEE \$ \_\_\_\_\_ MILEAGE \$ \_\_\_\_\_ TOTAL \$ \_\_\_\_\_  
DEPUTY \_\_\_\_\_



54328059

**15<sup>th</sup> JUDICIAL DISTRICT COURT****PARISH OF TRENTVILLE****STATE OF LOUISIANA****LARIZA R. WILLIAMS****VERSUS****THE PRUDENTIAL INSURANCE COMPANY OF AMERICA****INDEXED****NUMBER: \_\_\_\_\_****DIVISION "\_\_\_\_"**

\*\*\*\*\*

**PETITION FOR BREACH OF CONTRACT**

**TO THE HONORABLE JUDGES OF THE 15<sup>th</sup> JUDICIAL DISTRICT COURT IN  
AND FOR THE PARISH OF LAFAYETTE, STATE OF LOUISIANA:**

The petition of **LARIZA R. WILLIAMS** the full age of majority domiciled in the Parish  
of Lafayette, State of Louisiana and with respect represents the following:

1.

Made defendants herein are the following:

- A. **THE PRUDENTIAL INSURANCE COMPANY OF AMERICA**, a foreign  
corporation licensed to do and doing business in the State of Louisiana.

2.

At all times pertinent to this petition **THE PRUDENTIAL INSURANCE COMPANY  
OF AMERICA**, was the life insurance carrier of the plaintiff, **LARIZA R. WILLIAMS**.

3.

Approximately ten (10) years ago, **LARIZA R. WILLIAMS**, entered a life insurance  
contract with **THE PRUDENTIAL INSURANCE COMPANY OF AMERICA**, through her

**WALKER** and they had two (2) children who were also on the policy as beneficiaries;  
**TREVIOUS WALKER** AND **TREVEIONES WALKER**. **LARIZA R. WILLIAMS** and  
**TREVOR WALKER** were divorced but **LARIZA R. WILLIAMS** continued to maintain life  
insurance on him because of the children.

4.

**TREVOR WALKER** passed away on February 17, 2018.

5.

**LARIZA WILLIAMS** presented a claim under the policy and was denied because she was not legally married to **TREVOR WALKER** at the time of his death. Thus even though they were domestic partners.

6.

Petitioner now shows that for the past ten (10) years prior to **TREVOR WALKERS** death she paid all premiums due on the policy, the policy was never cancelled.

7.

At the time of **TREVOR WALKERS** death the burial expenses of Mr. Walker fail to its means to bury him. These bills are still outstanding.

8.

Amicable demand has proven to no avail.

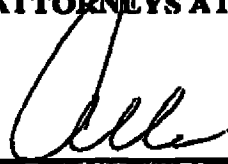
**WHEREFORE**, petitioner prays that the judgment be rendered in their favor and against the defendant, **THE PRUDENTIAL INSURANCE COMPANY OF AMERICA**, for a just amount that is reasonable in the premiscs with legal interest from the date of judicial demand until paid and for the costs of these proceedings.

**PETITIONERS FURTHER PRAY** for all general and equitable relief.

RESPECTFULLY SUBMITTED:

**MYLES & MYLES**  
**ATTORNEYS AT LAW**

BY:

  
**ALLEN J. MYLES**  
BAR NO. 6361  
P.O. BOX 77  
FLAQUEMINE, LA 70764  
(225) 687 2422

**PLEASE SERVE:**

**THE PRUDENTIAL INSURANCE COMPANY OF AMERICA**  
through its agent for service of process  
Louisiana Secretary of State  
8585 Archives Ave.  
Baton Rouge, Louisiana 70809

A TRUE COPY ATTEST  
8-10-19

Lafayette, LA

BY: CLERK OF COURT

FAX FILED THIS 14  
DAY OF Feb, 20 19

  
Deputy Clerk of Court



15<sup>th</sup> JUDICIAL DISTRICT COURT

PARISH OF IBERVILLE

NOTARY PUBLIC

LARIZA R. WILLIAMS

VERSUS

THE PRUDENTIAL INSURANCE COMPANY OF AMERICA

NUMBER: \_\_\_\_\_

DIVISION "\_\_\_\_"

\*\*\*\*\*

VERIFICATION

STATE OF LOUISIANA

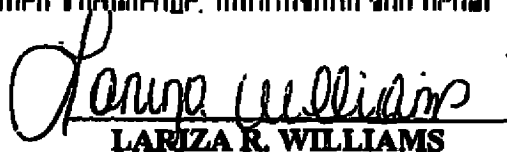
PARISH OF IBERVILLE

BEFORE ME, the undersigned authority, a Notary Public, duly sworn and qualified in  
and for the Parish of Iberville, State of Louisiana, personally came and appeared:

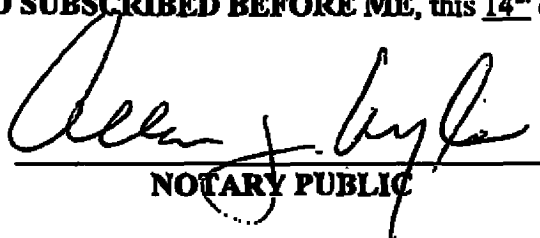
LARIZA R. WILLIAMS

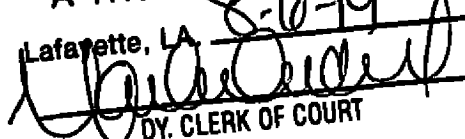
who, after first being duly sworn, did depose and say that:

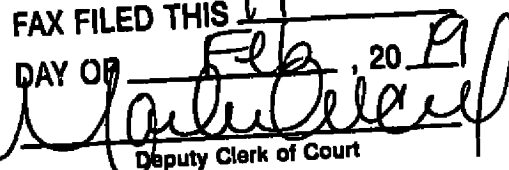
They are the petitioners in the foregoing Petition and that all the allegations of fact  
contained therein are true and correct to the best of their knowledge, information and belief

  
LARIZA R. WILLIAMS

SWORN TO AND SUBSCRIBED BEFORE ME, this 14<sup>th</sup> day of February, 2019.

  
NOTARY PUBLIC

A TRUE COPY ATTEST  
Lafayette, LA 8-6-19  
  
DY. CLERK OF COURT

FAX FILED THIS 14  
DAY OF Feb, 2019  
  
Deputy Clerk of Court



**15<sup>th</sup> JUDICIAL DISTRICT COURT**

**PARISH OF IBERVILLE**

**STATE OF LOUISIANA**

**LARIZA R. WILLIAMS**

**VERSUS**

**THE PRUDENTIAL INSURANCE COMPANY OF AMERICA**

**NUMBER: \_\_\_\_\_**

**DIVISION "\_\_\_\_"**

\*\*\*\*\*

**INTERROGATORIES**

**TO: THE PRUDENTIAL INSURANCE COMPANY OF AMERICA**  
through its agent for service of process  
Louisiana Secretary of State  
8585 Archives Ave.  
Baton Rouge, Louisiana 70809

The following interrogatories are propounded to you pursuant to the Louisiana code of Civil Procedure, as amended, and are to be answered under oath, in writing, within fifteen (15) days of service hereof. Said interrogatories are to be deemed continuing in nature so as to require supplementation of responses should further information responsive thereto become available.

**INTERROGATORY NO. 1:**

Please give the full name, address, and telephone number of the person answering these interrogatories on behalf of your insurance company.

**INTERROGATORY NO. 2:**

Please state in detail providing copies of any documentation necessary to explain your position, why you denied Ms. Lariza's claim for payment under the policy.

**INTERROGATORY NO. 3:**

Does the policy have an incontestability clause?

**INTERROGATORY NO. 4:**

State whether or not you have ever made written request to Ms. Williams regarding any changes to be made to the policy.

**INTERROGATORY NO. 5:**

Please state whether or not you have ever previously provided a complete copy of the policy from ten years ago as well as any updates or changes since that time to Ms. Williams. Please attach a copy of the original policy extended to Ms. Williams to these answers.

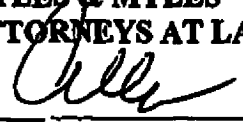
**INTERROGATORY NO. 6:**

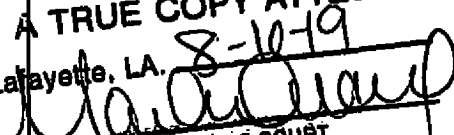
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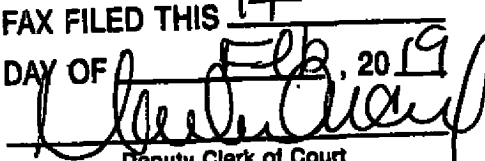
These interrogatories are to be deemed continuing so as to require supplemental answers under oath, fully and in writing, at any time that additional information may be obtained after answers are filed to these interrogatories, which would be furnished if the interrogatories should be continuously repeated.

RESPECTFULLY SUBMITTED:  
MYLES & MYLES  
ATTORNEYS AT LAW

BY:

  
ALLEN J. MYLES  
BAR ROLL NO. 8562  
P. O. BOX 877  
PLAQUEMINE, LA 70764  
(225) 687-2822

A TRUE COPY ATTEST  
Lafayette, LA. 8-10-19  
  
BY CLERK OF COURT

FAX FILED THIS 14  
DAY OF Feb, 2019  
  
Deputy Clerk of Court



15<sup>th</sup> JUDICIAL DISTRICT COURT

PARISH OF IBERVILLE

STATE OF LOUISIANA

LARIZA R. WILLIAMS

**INDEXED**

VERSUS

THE PRUDENTIAL INSURANCE COMPANY OF AMERICA

NUMBER: 20191017

DIVISION "C"

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CLERK OF COURT  
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2019 FEB 14 PM 1:34

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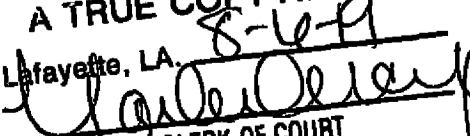
**MYLES & MYLES**  
**ATTORNEYS AT LAW**

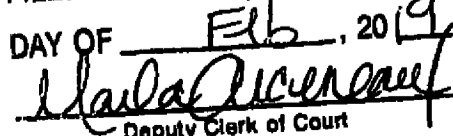
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15<sup>th</sup> JUDICIAL DISTRICT COURT

PARISH OF IBERVILLE

STATE OF LOUISIANA

LARIZA R. WILLIAMS

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NUMBER: \_\_\_\_\_

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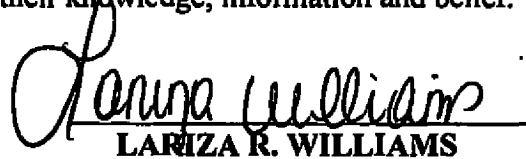
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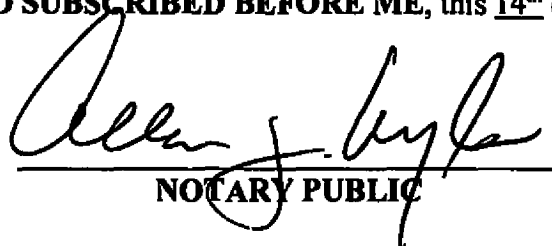
LARIZA R. WILLIAMS

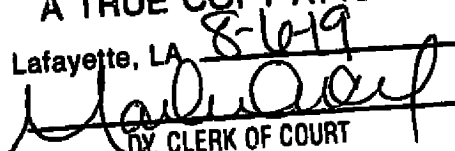
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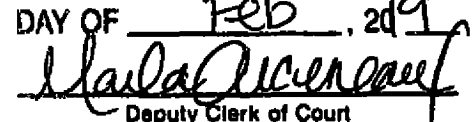
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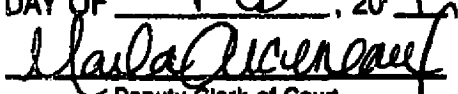
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